

COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY**

**PETITION OF DIG SAFE SYSTEMS, INC.
FOR IMPLEMENTATION OF 811 AS AN
ABBREVIATED DIALING CODE FOR
PROVIDING NOTIFICATION OF
EXCAVATION ACTIVITIES TO
UNDERGROUND FACILITY OPERATORS
WITHIN MASSACHUSETTS**

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D.T.E. 05-82

**KEYSPAN ENERGY DELIVERY NEW ENGLAND
PETITION FOR
LIMITED PARTICIPANT STATUS**

KeySpan Energy Delivery New England¹ (“KeySpan” or the “Company”), pursuant to 220 C.M.R. 1.03, hereby petitions the Department of Telecommunications and Energy (“Department”) for limited participant status in the above-captioned proceeding. In support of this request, KeySpan states the following:

1. The KeySpan companies are Massachusetts corporations located at 52 Second Avenue, Waltham, MA 02451.
2. The KeySpan companies are gas companies, as defined in G.L. c. 164, § 1, and are regulated by the Department, pursuant to G.L. c. 164.
3. KeySpan is a Dig Safe member operator that has extension underground facilities in Massachusetts and is subject to the Dig Safe laws.
4. The Department’s review of Dig Safe System, Inc.’s petition for implementation of the 811 Abbreviated Dialing Code in this proceeding is to address technical and operational

¹ Boston Gas Company, Colonial Gas Company and Essex Gas Company each do business in Massachusetts as KeySpan Energy Delivery New England.

issues related to implementation of 811 and, as such, would substantially and specifically affect KeySpan's interests because it is subject to the Dig Safe laws and is a Dig Safe member operator.

5. KeySpan's limited participant status will not jeopardize the Department's review and may assist in addressing the issues outlined in the Department's notice.

6. KeySpan's interests are unique and cannot be adequately represented by any other party.

7. Accordingly, KeySpan seeks to take part as a limited participant in this case and, where appropriate, submit comments, attend and participate in technical conferences, submit briefs, and to participate in this proceeding in any other manner deemed appropriate for limited participants by the Hearing Officer.

Wherefore, KeySpan respectfully requests that the Department grant this Petition for Limited Participant Status.

Respectfully submitted,

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Dated: February 22, 2006